

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>RARE BREED TRIGGERS, LLC, and</b>	)	
<b>ABC IP, LLC</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:23-cv-00021-CVE-JFJ</b>
	)	
<b>MADISON CRAWFORD, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT  
INJUNCTION**

Pursuant to a fully executed, confidential settlement agreement amongst all parties, resolving all claims and counterclaims at issue in this case, the Parties, through their respective undersigned counsel of record, hereby stipulate and agree to entry of a Consent Judgment and Permanent Injunction and in support thereof state as follows:

1. Plaintiffs and Defendants have resolved all claims and counterclaims in connection with this matter and have agreed to the entry of the Consent Judgment and Permanent Injunction (“Consent Judgment”) in the form attached hereto as Exhibit 1.
2. Defendants have executed a Consent to Be Bound by the Consent Judgment and Permanent Injunction, as also set forth in Exhibit 1, hereto.

Accordingly, as Plaintiffs and Defendants have resolved all claims and counterclaims in this action, the Parties respectfully request that this Court grant this Motion and enter the Consent Judgment.

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IT IS SO STIPULATED.

November 20, 2024

Respectfully submitted,

s/Glenn D. Bellamy

Glenn D. Bellamy (*Pro Hac Vice*)

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all Parties of Record via the Court's *ECF* Filing System on November 20, 2024.

/Glenn D. Bellamy/  
Glenn D. Bellamy